

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond) Division

In Re: Frederick J. Riemer aka Rick J. Riemer and Mary C.
Riemer

Case No. 13-33852-KRH
Chapter 13

HFC & Beneficial Members (HSBC Consumer Lending Mortgage Services, Servicer)
vs.

Frederick J. Riemer aka Rick J. Riemer and Mary C. Riemer, Debtors

Respondents

NOTICE OF OBJECTION TO DEBTOR'S CHAPTER 13 PLAN
AND HEARING THEREON
Real Property at 4005 Echo Ridge Place, Midlothian, Virginia 23112

HFC & Beneficial Members (HSBC Consumer Lending Mortgage Services, Servicer) herein, has filed papers with the court objecting to debtor's chapter 13 plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The hearing is scheduled for October 2, 2013 at 9:10am at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia.

DATE: September 4, 2013

/s/ Abby K. Moynihan, Esq.
Attorney for Creditor
312 Marshall Avenue, Suite 800
Laurel, MD 20707
301-490-1196
bankruptcyva@mwc-law.com
Bar No. 79686

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on September 4, 2013, to Frederick J. Riemer aka Rick J. Riemer at 4005 Echo Ridge Place, Midlothian, Virginia 23112 and Mary C. Riemer at 4005 Echo Ridge Place, Midlothian, Virginia 23112. Copies were sent electronically via the CM/ECF system to Pia J. North, Attorney for Debtors and Robert E. Hyman, Trustee.

/s/ Abby K. Moynihan, Esq.

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In Re: Frederick J. Riemer aka Rick J. Riemer and Case No. 13-33852-KRH
Mary C. Riemer Chapter 13

OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, HFC & Beneficial Members (HSBC Consumer Lending Mortgage Services, Servicer), which holds a Deed of Trust secured by the Debtor's real property at 4005 Echo Ridge Place, Midlothian, Virginia 23112, by and through its attorney, Abby K. Moynihan, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtors have proposed a plan which includes no provision for payment of arrearages owed to HFC & Beneficial Members (HSBC Consumer Lending Mortgage Services, Servicer). The plan proposes that the debtors intent to obtain a loan modification, however said modification has not been obtained to date.

2. The secured creditor, HFC & Beneficial Members (HSBC Consumer Lending Mortgage Services, Servicer), anticipates filing a Proof of Claim with arrearages in the approximate amount of \$54,970.47.

3. The plan as proposed by the Debtors would therefore be insufficient to pay the claim of HFC & Beneficial Members (HSBC Consumer Lending Mortgage Services, Servicer).

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively

2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/Abby K. Moynihan, Esq.

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Consumer Lending Mortgage Services, Servicer)
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301-490-1196
Bar No. 79686
Email: bankruptcyva@mwc-law.com

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/s/ Abby K. Moynihan, Esq.